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September 29, 2014

The Honorable Rya W. Zobel, U.S.D.J.
U.S. District Court, for District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, MA 02210

**Re: MDL No. 1:13-MD-2419-RWZ; In Re: New England Compounding Pharmacy, Inc.
Products Liability Litigation; United States District Court, District of Massachusetts**

Dear Judge Zobel:

This document relates to the following matters wherein Plaintiffs have filed Motions for Leave to Amend Short Form Complaints in each individual case docket, as follows:

Andre Gould, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No.: 1:13-cv-10444-FDS (Document 56);

Christopher Hannah, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No.: 1:13-cv-10407-FDS (Document 64);

Meghan R. Jones v. New England Compounding Pharmacy, Inc., et al.

Case No.: 1:13-cv-10409-FDS (Document 50);

Katheryn S. Leaverton, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No. 1:13-cv-10408-FDS (Document 45);

Jenna S. Letizia, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No. 1:13-cv-10413-FDS (Document 47);

Jennifer L. Marko, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No. 1:13-cv-10404-FDS (Document 55);

Greta E. Normand, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No.: 1:13-cv-10447-FDS (Document 48);

Naquita L. Rios, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No.: 1:13-cv-10411-FDS (Document 48);



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Robert S. Tayvinsky, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No.: 1:13-cv-10414-FDS (Document 50);

Diane E. Tisa, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No. 1:13-cv-10446-FDS (Document 41);

Jennifer L. Tolotti v. New England Compounding Pharmacy, Inc., et al.

Case No. 1:13-cv-10413-FDS (Document 43); and

Dawn M. Zavacki, et al. v. New England Compounding Pharmacy, Inc., et al.

Case No. 1:13-cv-10441-FDS (Document 45).

We have been advised by Chris Wolk, Esquire, counsel for Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, a/t/a Premier Orthopaedic Associates, Kimberley Yvette Smith, M.D. a/k/a Kimberley Yvette Smith-Martin, M.D. and Thomas A. Dwyer, M.D., the parties who Plaintiffs are seeking to add as Defendants, will not be filing opposition to any of the above-referenced Motions. Oral argument is not necessary. Accordingly, we respectfully request that Your Honor enter a ruling on these Motions on or before the next status conference scheduled on October 23, 2014.

We thank Your Honor for consideration of our request.

Respectfully submitted,

SALTZ, MONGELUZZI, BARRETT & BENDESKY, P.C.

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MFB/MTG/osl

cc: Christopher M. Wolk, Esquire (via electronic mail)